

## **FREQUENTLY ASKED QUESTIONS**

December 24, 2014

***Question: What is LELAP?***

**Answer:** LELAP is the Louisiana Environmental Laboratory Accreditation Program.

***Question: What does LELAP do?***

**Answer:** LELAP is the program responsible for assessing and accrediting environmental laboratories that generate data that is submitted directly or indirectly to the Department of Environmental Quality. LELAP also assesses and accredits laboratories that generate data for the Department of Natural Resources with regards to Method Manual 29B. LELAP monitors laboratories to ensure compliance with state regulation and national standards. LELAP maintains a database that includes contact information, physical location, and matrix/method/analytes for each accredited laboratory. LELAP is one of 15 National Environmental Laboratory Accreditation Program (NELAP) recognized Accreditation Bodies.

***Question: How long has LELAP been in existence?***

**Answer:** The Louisiana Environmental Laboratory Accreditation Program regulations were adopted May 1998. The Department of Environmental Quality was mandated by House Bill Number 1726 in 1988 and amended by Statute in 1995 by House Bill Number 1517 to adopt and promulgate rules and regulations providing for accreditation of commercial laboratories providing chemical analysis, analytical results or other appropriate test data to the Department. Private sector input was obtained in drafting the regulations as promulgated in 1998 and amended in 2000.

***Question: Are all laboratories required to be accredited by LELAP?***

**Answer:** No. In-house laboratories and government laboratories are exempt from accreditation requirements. Also exempt are personnel monitoring services in accordance with LAC 33:XV.430.C and to those activities specifically licensed in accordance with LAC 33:XV.Chapter 3.Subchapter B, equivalent agreement state regulations, and the Nuclear Regulatory Commission regulations.

***Question: What kind of laboratories need to be accredited by LELAP?***

**Answer:** Accreditation is required for commercial laboratories that perform environmental analyses or tests for third parties for a fee or other compensation on behalf of any facility as defined in R.S. 30:2004, required by permit, required by order of the Department, included in a monitoring report, submitted by contract or required by Department regulation.

***Question: What methods or analytes require accreditation?***

**Answer:** Laboratories must be accredited for all test methods and analytes for which the test data will be reported directly or indirectly to LDEQ. In addition, if LELAP program identifies performance test samples in different matrices, the laboratory must also make sure that it obtains, analyzes, and successfully passes performance tests of samples for all matrices that it will be testing.

***Question: Where is LELAP located?***

**Answer:** LELAP is physically located in the LDEQ Headquarters Building, 602 N. Fifth Street, Baton Rouge, LA 70802. Organizationally, LELAP is a Section of the Public Participation and Permit Support Division within LDEQ's Office of Environmental Services.

***Question: How do I contact LELAP?***

**Answer:** LELAP may be contacted by:

Phone: (225) 219-3185

Fax: (225) 219-3310

E-mail: Paul.Bergeron@la.gov

Physical Location: 602 N. Fifth Street, Baton Rouge, LA 70802

Mailing Address: P.O. Box 4313, Baton Rouge, LA 70821-4313

***Question: What is The NELAC Institute?***

**Answer:** The NELAC Institute (TNI) is a 501(c)(3) non-profit organization whose mission is to foster the generation of environmental data of known and documented quality through an open, inclusive, and transparent process that is responsive to the needs of the community. The organization is managed by a Board of Directors and is governed by organizational bylaws. More information on TNI is available at the TNI web site at: <http://www.nelac-institute.org/>

***Question: How was TNI formed?***

**Answer:** The NELAC Institute was created on November 6, 2006, when the respective Boards of Directors of the National Environmental Laboratory Accreditation Conference (NELAC) and the Institute for National Environmental Laboratory Accreditation (INELA) agreed to combine the two organizations into a single national accreditation program, The NELAC Institute (TNI). As reflected in the new name, The NELAC Institute (TNI) has combined the heritage of NELAC with the consensus standards development process of INELA into one organization.

***Question: Can I Join TNI?***

**Answer:** Membership in TNI is open to any individual interested in laboratory accreditation in the private, public or academic sectors. The NELAC Institute has both individual members and organizational members. However, only individual members may vote. Membership fees for individuals are \$50; organizations pay a sliding scale based on the level of commitment of the organization. Membership is open to all individuals or organizations interested in environmental laboratory accreditation.

***Question: What is NELAC?***

**Answer:** NELAC is an acronym for the National Environmental Laboratory Accreditation Conference. NELAC was established as a cooperative association of States and Federal Agencies to develop and promote mutually acceptable performance standards for the operation of environmental laboratories. NELAC was merged into The NELAC Institute (TNI) on November 6, 2006 and formally dissolved on January 16, 2008.

***Question: What is NELAP?***

**Answer:** NELAP is an acronym for the National Environmental Laboratory Accreditation Program, which was established to implement the NELAC standards. NELAP has recognized 15 State programs as Accreditation Bodies. The functions of NELAP have also been incorporated into TNI.

***Question: What is covered by the TNI Standards?***

**Answer:** The standards cover both analytical testing of environmental samples, administrative requirements, and the laboratory accreditation process. The purpose of the TNI Standards is to foster the generation of environmental laboratory data of known and acceptable quality on which to base public health and environmental management decisions.

***Question: Now that NELAP has been incorporated into TNI, are the NELAC Standards still used?***

**Answer: Yes.** The 2003 NELAC Standards will continue to be used by certain states until the TNI Standards have been fully developed and adopted.

***Question: How do I obtain copies of analytical methods?***

**Answer:** The internet has become an excellent resource for official methods, including the US EPA web pages. The most usable and complete example is probably the National Environmental Methods Index (NEMI), a joint effort of EPA and USGS. (<http://www.nemi.gov/> ) This index is free and searchable by source [for example HACH, or Standard Methods], instrumentation, keyword such as analyte name or CAS number or method number, and so forth. It includes regulatory and non-regulatory analyses. Searches of NEMI typically yield lists, and then single-page method summaries with hot links to sources.

- EPA water methods required by the CWA and SDWA, as well as information on those regulations: <http://www.epa.gov/waterscience/methods/>

- SW846 methods: <http://www.epa.gov/epaoswer/hazwaste/test/sw846.htm>

- For a full set of Standard Methods, purchase the latest edition of the book and/or CD ROM: <http://www.standardmethods.org/>

- HACH methods beyond the single page summaries in NEMI: <http://www.hach.com/hc/browse.product.category>

- Pesticide information and methods: <http://www.epa.gov/oppbead1/methods/>

Frequently a method is available as a .pdf file, which can be downloaded or printed. Government sources tend to be free, whereas there are generally fees at some commercial sites. You must check the Federal Register to determine which methods and revisions have been approved by the Environmental Protection Agency (EPA) for regulatory testing.

***Question: If an out-of-state lab has been granted NELAP accreditation by another accrediting body, do they still need to be accredited by LELAP to do testing for Louisiana?***

**Answer:** Yes. Even though the laboratory has been granted accreditation by another accreditation body, the laboratory still must apply for and receive accreditation from LELAP in order to do testing for Louisiana.

***Question: What is Secondary Accreditation?***

**Answer:** Secondary Accreditation, also known as accreditation by recognition, is accreditation approved and granted by LELAP based on the accreditation granted by another Accreditation Body.

***Question: Is there a reduced fee for secondary NELAC accreditation?***

**Answer:** There is no reduced fee for secondary NELAC accreditation.

***Question: How often do I have to perform Proficiency Test (PT) Studies?***

**Answer:** All laboratories that have been accredited or are seeking accreditation must perform a minimum of two PT studies per year for each Field of Accreditation, approximately six months apart.

***Question: Do I have to do a PT for every analyte?***

**Answer:** Yes, all laboratories that have been accredited or are seeking accreditation must complete Proficiency Tests for all analytes. And the laboratory must receive an “acceptable” score for each analyte for two out of three consecutive PT studies.

***Question: My stack testing firm does not have a “laboratory.” Is my firm exempt from the accreditation requirements that are established in LAC for laboratories?***

**Answer:** No. LAC 33:I.4503 defines a “laboratory” as “any facility, whether fixed-based, mobile, or field, that analyzes environmental samples and that seeks accreditation by the department.” In accordance with that definition, stack testers are included in the definition of word “laboratory” for the purpose of accreditation.

***Question: Due to the high cost in Proficiency samples for air analyses, are stack testing organizations exempt from the requirement to perform PTs on a semiannual basis?***

**Answer:** No. In accordance with LAC 33:I.4711, all laboratories must satisfactorily complete two proficiency test studies per year for each field of testing. If proficiency test samples are not available for particular test categories, the laboratory must submit an “analytical data package.”

***Question: What is an “analytical data package”?***

**Answer:** An “analytical data package” is described in the regulations as all relevant analytical methodology, technical information, and quality assurance results concerning a particular type of analysis for which there is no current proficiency testing program” (LAC 33:I.4711.B), In lieu of proficiency test results, the

laboratory must submit documentation of the quality control performed for the analyses for which there are no approved proficiency test, along with a copy of the standard operating procedure and reference method.

***Question: Which PT providers can I use?***

**Answer:** Laboratories may select any PT provider from the list of NELAC Proficiency Test Providers at: [PT Providers - The NELAC Institute \(TNI\)](#)

**Stack/Emission Testers may use an approved PT Provider from the list below:**

Air Gas Specialty Gas Durham North Carolina

Please be advised that the Louisiana Department of Environmental Quality has suspended until further notice the requirement for accredited stack testers to conduct proficiency test (PT) studies using double-blind mixtures of gases for instrumental methods. In lieu of the PT studies, currently accredited stack testers will be required to maintain calibration records, which will be reviewed by LELAP assessors upon request or at the time of the assessment. All stack testers shall maintain analytical data packages and retained maintenance records for the biennial assessments.

***Question: I am an out-of state laboratory but I do not have NELAP accreditation. What do I need to do?***

**Answer:** There are 14 other states with [NELAP-recognized Accreditation Bodies](#) . If your laboratory is located in one of those states, please contact the state accreditation body to verify that it offers the scope of accreditation that you need. Otherwise, you may apply to any one of them. Some of the Accreditation Body programs are limited, and you may need to apply to more than one Accreditation Body to obtain accreditation for the methods and analytes that you will use to support LDEQ programs. If you apply to a program other than Louisiana, you will need to apply for secondary accreditation from LELAP.

***Question: If the quality control specifications of a mandated method (required by EPA or State Authority) are different from the essential quality control requirements specified by the TNI standards, what are my options?***

**Answer:** In cases where there are different sets of applicable requirements, the laboratory must meet or exceed the most stringent/demanding requirements.

***Question: What is the Method Update Rule (MUR)?***

**Answer:** The Method Update Rule refers to recent changes in the list of EPA-approved tests and sampling procedures under the Clean Water Act and National Drinking Water regulations. Three separate revisions to 40 CFR 136 have been published in the Federal Register, and are referred to collectively as the Methods Update Rule (MUR). The MUR grants approval for a number of new and revised methods, and withdraws approval for a substantial number of methods that had previously been approved.

***Question: Where can I get copies of the Method Update Rule?***

**Answer:** The full text of the two 2007 Final Rules that implement the MUR can be downloaded in PDF format from the following links:

- Federal Register / Vol. 72, No. 47 / Monday, March 12, 2007 / Rules and Regulations

<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.pdf>

• Federal Register / Vol. 72, No. 57 / Monday, March 26, 2007 / Rules and Regulations

<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-26/w1455.pdf>

The full text of the 2012 Final Rule can be download from a browser:

Federal Register/Vol. 77, No. 97/Friday May 18, 2012/ Rules and Regulations

<http://www.gpo.gov/fdsys/pkg/FR-2012-05-18/html/2012-10210.htm>

***Question: Where can I find more information on the Method Update Rule?***

Answer: Information on how the Method Update Rule has been implemented in Louisiana can be found at the following links:

[http://www.deq.louisiana.gov/portal/Portals/0/laboratory/Method%20Update%20Rule%20\(MUR\)%20letter.pdf](http://www.deq.louisiana.gov/portal/Portals/0/laboratory/Method%20Update%20Rule%20(MUR)%20letter.pdf)

<http://www.deq.louisiana.gov/portal/Portals/0/laboratory/MUR%20Guidance%20for%20Water%20Permits%20Division.pdf>

<http://www.deq.louisiana.gov/portal/portals/0/news/pdf/NewEPAlabrulePR.pdf>

***Question: One of the accreditation requirements concerns traceability of measurements. Where can I find more information on ways to comply with this requirement?***

Answer: Information on suitable ways to obtain traceability of measurement can be found that the following links:

[American National Standards Institute - ANSI](#)

[National Institute of Standards and Technology](#)

[BIPM - home page](#)

***Question: What do assessments involve, how often must my laboratory be assessed, and how much does it cost?***

Answer: An assessment involves a determination onsite or offsite by LELAP personnel of the competence of a laboratory, based on the regulations or the national standard, for the methods and parameters requested by that laboratory's application for accreditation. Assessments are performed every two years at a minimum, although they may be more frequent based on changes reported by the laboratory or complaints received by LELAP. Assessments fees are charged by LELAP personnel as allowed by the Division of Administration, typically averaging \$200-\$300; assessment fees are also charged by contractors, typically averaging \$4000-\$5000.